



Alan C. Lloyd, Ph.D.
Agency Secretary

California Regional Water Quality Control Board
North Coast Region
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Arnold
Schwarzenegger
Governor

July 28, 2005

Ms. Julie B. Raming
Georgia-Pacific Corporation
P.O. Box 105605
Atlanta, GA 30348-5605

Dear Ms. Raming:

Subject: Workplan for Additional Site Assessment

File: Georgia-Pacific Fort Bragg Sawmill, 90 West Redwood Avenue, Fort Bragg
Case No. 1NMC462

Thank you for the two June 8, 2005 documents from Acton Mickelson Environmental, Inc. regarding the Georgia-Pacific Fort Bragg sawmill site: *Response to RWQCB Comments on TRC's Phase I and Phase II Environmental Site Assessments* (Response to Comments) and *Workplan for Additional Site Assessment* (Workplan). Regional Water Board staff have reviewed the documents and have the following comments:

- In the Response to Comments, a table of associated chemicals of potential concern and excerpts from the facility Hazardous Materials Business Plan were submitted in response to our request for a description of operations at the site since the Phase I report was prepared. Descriptions of the operations should also be submitted.
- If, during the course of the investigation work, alternative methodologies or additional sampling locations other than those in the Workplan need to be used, please contact Regional Water Board staff for approval. A brief written description may need to be submitted for documentation.
- Dioxin testing at the site is proposed in the Workplan for different operational areas, but the proposed testing is not summarized. A summary of the proposed dioxin testing should be submitted. This summary should relate the proposed sampling to the September 2, 2004 Exponent report contained in the September 9, 2004 TRC *Response to Comments*.

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PARCEL 3

- Borings to collect groundwater samples for analysis for pentachlorophenol and tetrachlorophenol should be added to the green chain area and the lumber storage and loading areas of Parcel 3.
- A boring should be added in the former mobile equipment shop proximate to the aboveground gasoline tank that is or was located just east of Georgia-Pacific property.
- During the site visit June 30, 2005 with Michael Acton and Jeff Heglie of Acton Mickelson Environmental and others, we noted two features in the Machine Shop that should be added to the investigation. One was a sump that contained an oily material. The other was a possible track pit, indicated by differences in the floor paving.

PARCEL 5

- Monitoring wells should be installed between the mobile equipment shop and the log pond where TPH impacts were found through the July 2004 pothole investigation.
- The two former UST areas near the mobile equipment shop should be included in the geophysical investigation to check for underground storage tanks.

PARCEL 10

- The ash fill in this area should be evaluated for PAH and dioxin impacts.

POND 8 (LOG POND)

- It is not clear that the proposed boring methodology for the log pond sediments will be able to extend through the full depth of sediment and fill material to native material. A contingency plan should be submitted for how this sampling will be performed if the methodology proposed in the Workplan does not reach the full depth.
- It was stated in the Response to Comments that sediment samples may be analyzed for PCBs if PAHs are detected. PCB analyses should be performed on sediment samples regardless of PAH detections.

ANALYSES

- What filtering method, if any, will be used on groundwater samples for metals analyses?
- The detection limit for tetrachlorophenol should be no higher than 1.0 µg/l.
- In Table 1 of the Workplan, formaldehyde was listed as a chemical of potential concern. However, no analysis for formaldehyde was proposed and it was noted that formaldehyde is unstable in water. Formaldehyde should still be analyzed for in samples from the appropriate operational areas.

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- Analysis for oil-range TPH should be included in the analyses for the following areas (the numbers in parentheses are the corresponding section numbers in the Workplan): high-ceiling wooden warehouse (5.2.1); railroad spurs (5.3.1); hazardous materials storage area (5.7.1); beehive burner and fuel aboveground storage tanks (5.7.2); and the soil stockpile (5.7.5).
- The TPH analyses performed need to produce results useable for the risk assessment. It had been proposed that the TPH Criteria Working Group method be used as part of the risk assessment.
- Will silica gel cleanup be used with any analyses for TPH?
- The testing for transformer oil impacts should include analysis for TPH in addition to the proposed PCB analysis.

A response to these comments will need to be submitted to this office and approved by Regional Water Board staff before this work is implemented. If you have any questions or comments, you may contact me at chunt@waterboards.ca.gov or (707) 570-3767.

Sincerely,

/ORIGINAL SIGNED BY CODY WALKER FOR/

Craig Hunt
Water Resource Control Engineer

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cc: Acton Mickelson Environmental, Inc., 5175 Hillsdale Circle, Suite 100, El Dorado Hills,
CA 95762

Ms. Kay M. Johnson, Tetra Tech, Inc., 3746 Mt. Diablo Boulevard, Suite 300, Lafayette,
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Mr. Doug Heitmeyer, Georgia-Pacific Corporation, 90 West Redwood Avenue, Fort
Bragg, CA 95437

Ms. Linda Ruffing, Community Development Department, City of Fort Bragg, 416 N.
Franklin Street, Fort Bragg, CA 95437

Mendocino County Environmental Health Department, 501 Low Gap Road, Room 1326,
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Mr. Dave Goble, Public Works Department, 416 N. Franklin Street, Fort Bragg, CA
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Mr. Andy Whiteman, City Manager, 416 N. Franklin Street, Fort Bragg, CA 95437

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